

REMARKS

Claims 1, 4, and 21-23 remain for reconsideration. Claims 2, 3, and 5-15 were previously cancelled. Claims 16-20 are herein cancelled to reduce the issues on reconsideration.

In the present Office Action, all pending claims stand rejected as in the previous Office Action. Specifically, all claims 1, 4, 16-17, and 21-23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,771,760 to Vortman in view of U.S. Patent 5,742,675 to Kilander.

The rejection to claims 18-20 over Vortman and Kilander, as above, further in view of Bateman has been rendered moot by the cancellation of these claims.

The remaining rejection is respectfully traversed based on the following discussion.

Briefly, embodiments of the present invention are directed to providing customer service support and, more particularly, to a call back system wherein the customer does not have to wait on hold to speak to an agent (e.g., customer service representative).

As discussed in the application, many older customer call centers still

in use do not have call-back or web capabilities (page 5, lines 10-15). Thus, the customer must wait on hold for the next available agent. It is very costly to upgrade these call centers.

As shown in Figure 7, embodiments of the present invention provide a telephony server which can cost effectively provide non-call back call centers with call back capabilities without need of costly upgrades. When a customer calls for service or requests service via a web page, the customer provides a call back phone number and may specify a particular problem. The call back numbers and corresponding problems are stored in a telephony server. The telephony server then calls the call center and waits for an agent (rather than the customer waiting on hold for the agent). In addition, the server may convert information about the customer into DTMF signals which is understood by the call center prompts. When an agent answers, the agent enters his/her ID, also via DTMF, such that the telephony server recognizes the agent as available. The telephony server can then call back the customer and bridge the call between the customer and the available agent. The server may also match the available agent having expertise with a particular problem to a particular call-back request. In this manner, the agent with the appropriate skill set to solve the customer's particular problem may be selected to deal with the customer.

All claims as presented include the feature or functionality of the telephony server for detecting when an agent is available when the agent enters

their DTMF identification thus providing a call back center not having call-back capabilities with call-back capabilities.

This argument was previously persuasive to overcome all previous grounds of rejection.

However, in the Examiner's "Response to Arguments" section of the final Office Action, while the Examiner has made no official enablement rejection, the Examiner states that "Claim 1 recites 'a call center not having call back capabilities' is not true and inconsistent with Applicant's own specification (see page 4, line 1, page 6, lines 2-5)".

However, page 4, line 6 is in the background section and merely sets forth the environment for the invention. That is, it explains that most call back centers don't have call back capabilities and then goes on to explain the need to add such capabilities to those centers without introducing any disruption to the systems currently in operation. Thus, the present invention is to "retro fit", if you will, call centers with no call back capabilities to provide call-back capabilities. Page 6, lines 2-5 is an embodiment of the invention enabling call back capabilities (i.e. to "retro-fit" call centers with no call back capabilities to provide call-back capabilities). Thus, the claims are clearly NOT inconsistent with the specification. Indeed, page 5, lines 12-13 clearly states "This arrangement is suitable for use with an existing call center that does not utilize web activation and/or automated call back" (emphasis added).

With regard to the Examiner's argument that Vortman does not have

automated call-back capabilities, it clearly does. In Vortman, when an agent becomes available, an email (automated) is sent to an agent and the agent places an outgoing call (column 2, lines 8 *et seq.*). However, Vortman recognizes the limitations of such a system which makes it difficult to track and gather statistics on outgoing calls. Thus, as understood, Vortman generates an “incoming call” event for the outgoing call such that it may be better tracked. Thus “improving call back capabilities” that already exist.

Regardless, it is clear that neither Vortman nor Kilander teach or suggest a system for giving call back capabilities to a center not already having call-back capabilities. Thus, the combination of these references cannot make a case of *prima facie* obviousness.

As amended, independent claim 1 recites “connecting a telephony server between a user station and a call center not having call back capabilities via a telephone switching network, the call center in communication with at least one agent station... the telephony server calling back the user station and bridging a call back between the user station and the available agent...” (emphasis added).

Finally, independent claim 21 recites “a call center to connect an incoming call to an agent telephone, the call center being without call-back capabilities;
a telephony server comprising:

a receiver for receiving a request for a call-back from a user over the

internet; a dual tone multi frequency (DTMF) generator for encoding user information into DTMF commands understood by the call center; a transmitter to call the call center over the telephone network providing the DTMF commands; a DTMF detector for receiving a DTMF string entered by an agent answering the agent telephone to identify that the agent is available; and a bridge for calling back the user to connect the available agent to the user" (emphasis added).

The above features recited in the claims are not taught or suggested by the prior art of record. As such, it is respectfully requested that the outstanding rejections be withdrawn.

In view of the foregoing, it is requested that the application be reconsidered, that claims 1, 4, and 21-23 be allowed and that the application be passed to issue. Please charge any shortages and credit any overcharges to Intel's Deposit Account number 50-0221.

Respectfully submitted,

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